

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	<b>Case No. 5-18-bk-04040-RNO</b>
<b>Charles A. Hayes, III,</b>	:	
	:	<b>Ch. 13</b>
Debtor	:	
	:	
Select Portfolio Servicing, Inc. as servicing	:	
agent for Deutsche Bank National Trust	:	
Company, as Trustee, in trust for registered	:	
Holders of Long Beach Mortgage Loan Trust	:	
2005-WL1, Asset-Backed Certificates, Series	:	
2005-WL1,	:	
Movant	:	
	:	
v.	:	
	:	
Charles A. Hayes, III dba The Commander,	:	
Debtor/Respondent	:	
	:	
and	:	
	:	
Charles J. DeHart, III (Trustee),	:	
Trustee/Respondent	:	

**Answer to Motion for Relief from the Automatic Stay and  
Request for Waiver of Fed. R. Bankr. P. 4001(a)(3) Stay**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

9. Admitted.

10. Denied as Stated. The Debtor admits to some delinquency because his business had been impacted by COVID, however, he more recently found additional employment and is able to resume payment. By way of further answer, the rental unit had been vacant for several months, but a new tenant moving in, and the rent should be able to cover future payments. The Debtor will also be able to cure the arrears.

11. Denied and proof demanded.

12. Denied.

13. Denied in part. Although it is admitted that Section 362(d) reads as stated, the applicability is denied.

14. Denied in part. To the extent that paragraph 14 is stating that 362(d)(1) and (d)(2) are separate grounds for relief the Debtor does not dispute that but the Debtor does deny that relief is appropriate.

15. Denied. Debtor has the ability to make the payment and cure any arrears.

16. Denied.

17. Denied.

WHEREFORE, Debtor requests that the Motion for Relief be denied.  
of the Order approving such transfer.

DORAN & DORAN, P.C.

BY: /s/ Lisa M. Doran

LISA M. DORAN, ESQUIRE

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